

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

In the Matter of the Search of

USPS Priority Mail Express parcel EE306958252US addressed
to "Gerard Bun, 2168 S. Atlantic Blvd PMB #351 Monterey
Park, CA 91754."

Case No. 2:20-mj-431

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property
USPS Priority Mail Express parcel EE306958252US addressed to "Gerard Bun, 2168 S. Atlantic Blvd PMB #351 Monterey Park, CA 91754."

located in the Southern District of Ohio, Eastern Division, there is now concealed (*identify the person or describe the property to be seized*):

A quantity of a controlled substance and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1) and 843(b).

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

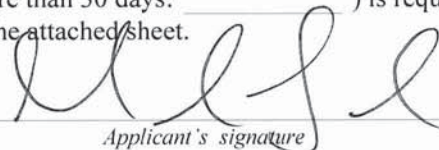
The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
Title 21 USC 841(a)(1)	Possession with intent to distribute a controlled substance
Title 21 USC 843(b)	Prohibited use of a communication center (U.S. Mail)

The application is based on these facts:

See attached affidavit.

- ☒ Continued on the attached sheet.
☐ Delayed notice of days (give exact ending date if more than 30 days:) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

MOHAMED A. SABRAH, U.S. POSTAL INSPECTOR

Printed name and title

Sworn to before me and signed in my presence.

Date: June 19, 2020

City and state: Columbus, Ohio


 Kimberly A. Johnson
 United States Magistrate Judge



B.M
6/18/20

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN THE MATTER OF THE SEARCH OF

USPS Priority Mail Express parcel
EE306958252US
addressed to "Gerard Bun,
2168 S. Atlantic Blvd PMB #351
Monterey Park, CA 91754."

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Case no: 2:20-mj-431

Magistrate Judge

UNITED STATES POSTAL INSPECTION SERVICE

I, MOHAMED A. SABRAH, DO HEREBY DEPOSE AND SAY:

1. I am a United States Postal Inspector and have been so employed since February 2016, presently assigned at Columbus, Ohio to investigate Prohibited Mailing offenses. I have received training in the detection and investigation of drug trafficking. I have worked Prohibited Mailing (Narcotics) investigations since February 2016, during which time I have been involved in narcotics investigations leading to prosecution in U.S. District Court.
2. I know based on training and experience that U.S. Mail is often used by narcotic traffickers to transport controlled substances as well U.S. currency derived from their illicit activities, either as proceeds and or payment. I know from my training and experience that the Priority Mail system is commonly used to transport controlled substances and associated U.S. currency because Priority Mail provides traceability, reliability, and timely delivery. The guaranteed delivery timeframe of approximately two days for Priority Mail Express places time pressures on law enforcement agents to identify, search, and deliver these drug parcels in a timely manner.
3. On May 1, 2019, law enforcement with the Union County Sheriff's office spoke to Carson Smith at the Union County Sheriff's Office, in reference to marijuana complaints that occurred at North Union High School. Through the interview law enforcement learned; Carson Smith was stopped on April 21, 2019 and inside his vehicle was an empty jar of marijuana, Smith admitted to smoking marijuana on occasion.
4. On June 4, 2020, the Union County Sheriff's office received an online drug tip regarding drug activity with Smith. The tip states that Smith is selling marijuana and cocaine out of 29892 State Route 37, Richwood, OH 43344. On June 5, 2020, Union County Sheriff's office detectives conducted surveillance on Smith and confirmed that Smith resides at 414 Gallery Ln. Marysville, OH 43344. On the same day, detectives confirmed that Smith's parents reside at 29892 State Route 37, Richwood, OH 43344.

5. On June 13, 2020, the Union County Sheriff's office received several anonymous tips regarding drug activity involving Smith. The anonymous tipster took pictures with their cell phone of text messages on what is believed to be Carson Smith's cell phone and attached those pictures to the tip form. The first series of text messages captured in the pictures is transcribed as follows:

- i. Lamar- Send Tracking
- ii. Carson- EJ055624924US
- iii. Lamar- How much did you send
- iv. Carson- send 1500\$
- v. Lamar- okay & I have 800
- vi. Carson- Plus that 800
- vii. Carson- I'm grab one them 2300 packs
- viii. Lamar- Prayer emoji
- ix. Carson- Didn't wanna send you guys bunch small bills so just grabbed one until these exchanged
- x. Lamar- appreciate it brotha
- xi. Lamar- yes what's order
- xii. Lamar- also, your box is made will be sent soon
- xiii. Carson- I'm grab one of each 3 kings and rain maker
- xiv. Carson- U got that address
- xv. Lamar- okay, Daniel Torres 415 First Ave, Rio Dell, CA 95562 United States
- xvi. Lamar- *Sent picture of tracking label*

6. The tipster also sent a picture of a message that Carson Smith sent to "OG" on Snapchat. The message is transcribed as follows:

Either Carson Smith or Bridget smith
29892 SR-37
Richwood, OH 43344
Pound of blue pine

7. On June 17, 2020, Detectives from the Union County Sheriff's office contacted the Columbus, OH Postal Inspectors after learning that Smith may have mailed an express parcel to California, which they believe may contain currency.
8. On June 18, 2020, Inspectors took custody of USPS Priority Express Mail parcel with tracking number EE306958252US (SUBJECT PARCEL) addressed to "Gerard Bun, 2168 S. Atlantic Blvd PMB# 351 Monterey Park, CA 91754" and bearing the return address of "414 Gallery Drive Marysville, OH 43040, Carson Smith." The parcel is a Priority Mail Express mailing envelope measuring 11 x 15, weighing 4.8 ozs, and was

mailed on June 17, 2020, from Marysville, OH with \$37.15 postage affixed.

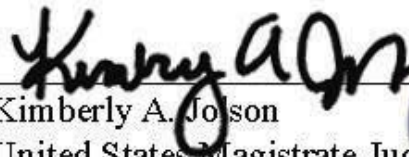
9. The SUBJECT PARCEL is currently located at the U.S. Postal Inspection Service Columbus Domicile, 850 Twin Rivers Dr. Columbus, OH 43216.
10. Priority Mail Express parcel EE306958252US did not require a signature for delivery. Signature Waivers are commonly used on parcels of illegal proceeds so the intended recipients do not have to have contact with the delivery employee and/or law enforcement should the parcel be seized.
11. Your affiant ran both the return and recipient addresses in CLEAR, an electronic database that has proven reliable in previous investigations in determining the legitimacy of name, address, and phone number information.
12. According to CLEAR, the delivery address of 2168 S. Atlantic Blvd PMB# 351 Monterey Park, CA 91754, does exist and is a UPS store. Law enforcement were unable to confirm the name belonging to PMB# 341 at this UPS Store.
13. According to law enforcement databases, the return address of 414 Gallery Drive Marysville, OH 43040, does exist and can be associated to Smith as a resident.
14. I know based on my training and experience that California is a common originating area for controlled substances sent through the U.S. Mail with the Southern/Central Ohio area being a common destination point for controlled substances sent through the U.S. Mail. I also know that California is a common destination point for narcotic proceeds. I know based on training and experience that information listed herein identifies common characteristics of a U.S. Postal Service parcel which contains narcotic proceeds.
15. Based on the information contained herein, your Affiant maintains there is probable cause to believe that U. S. Postal Service Priority Mail Express parcel bearing label no. EE306958252US, contains controlled substances, and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1).

16. WHEREFORE, your affiant respectfully requests that the Court issue a warrant, authorizing agents of the USPIS, including but not limited to other law enforcement agents and technicians assisting in the above-described investigation, to open, view, and photograph the SUBJECT PARCEL and its contents.



MOHAMED A. SABRAH
POSTAL INSPECTOR

Sworn to before me, and subscribed in my presence, this 19th day of June, at Columbus, Ohio.



Kimberly A. Tolson
United States Magistrate Judge

